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19 Attorneys for Plaintiff
20 UNITED STATES OF AMERICA

21 UNITED STATES DISTRICT COURT

22 FOR THE CENTRAL DISTRICT OF CALIFORNIA

23 UNITED STATES OF AMERICA,

24 No. CR 20-326(A)-JFW-2,4,5,6

25 Plaintiff,

26 v.
STIPULATION RE: PROTECTIVE ORDER
REGARDING DISCOVERY CONTAINING
PERSONAL IDENTIFYING INFORMATION
AND COOPERATING WITNESS
INFORMATION [DKT. 47]

27 JOSE LUIS HUIZAR,
28 RAYMOND SHE WAH CHAN,
aka "She Wah Kwong,"
WEI HUANG,
SHEN ZHEN NEW WORLD I, LLC,
DAE YONG LEE,
aka "David Lee,"
940 HILL, LLC,

Defendants.

29 Plaintiff, United States of America, by and through its counsel
30 of record, the United States Attorney for the Central District of
31 California and Assistant United States Attorney Mack E. Jenkins,
32 Veronica Dragalin, and Melissa Mills, and defendants RAYMOND CHAN,
33 SHEN ZHEN NEW WORLD I, LLC, DAE YONG LEE, and 940 HILL, LLC, by and
34

1 through their respective counsel of record, hereby stipulate that
2 defendants CHAN, SHEN ZHEN NEW WORLD I, LLC, LEE, and 940 HILL, LLC,
3 agree to the terms of the Court's August 3, 2020 protective order,
4 Docket No. 47, governing the use of discovery containing personal
5 identifying information and cooperating witness information (the
6 "Protective Order"), along with the following terms:

7 1. Defendant CHAN is charged in this matter with violations
8 of 18 U.S.C. §§ 1962(d) (Racketeering Conspiracy), 1343, 1346
9 (Honest Services Wire Fraud), 666 (Federal Program Bribery), and
10 1001 (False Statements). Defendant SHEN ZHEN NEW WORLD I, LLC is
11 charged with violations of 18 U.S.C. §§ 1343, 1346 (Honest Services
12 Wire Fraud), 1952 (Travel Act violation), and 666 (Federal Program
13 Bribery). Defendants LEE and 940 HILL, LLC are charged with
14 violations of 18 U.S.C. §§ 1343, 1346 (Honest Services Wire Fraud),
15 1519 (Obstruction of Justice), and 666 (Federal Program Bribery).
16 Defendants CHAN and LEE are released on bond pending trial.
17 Defendant WEI HUANG has not yet appeared in the case.

18 Definition of "Defense Team"

19 2. As to defendant SHEN ZHEN NEW WORLD I, LLC, the term
20 "Defense Team" may include attorneys who are not attorneys at
21 defense counsel of record Richard Steingard's law firm, but who
22 represent individuals employed by SHEN ZHEN NEW WORLD I, LLC, or its
23 parent corporation, and who execute a written agreement to be bound
24 by the terms of the Protective Order, to be provided to the
25 government and maintained at Richard Steingard's offices.

26 Paragraph 5 as to Defendant WEI HUANG

27 3. Paragraph 5(g) of the Protective Order outlines the
28 procedures for a defendant to "see and review" Cooperator Material

1 in the presence of the Defense Team. The Protective Order
2 contemplates a member of the Defense Team showing defendant
3 Cooperator Material documents in person, by, for example, referring
4 to defendant not taking material "out of the room." Paragraph 5(h)
5 prohibits defendant from writing down or memorializing any data or
6 information contained in the Cooperator Material.

7 4. WEI HUANG, who is currently located in China, is a
8 corporate representative of defendant SHEN ZHEN NEW WORLD I, LLC,
9 and a named defendant in his personal capacity. Counsel for SHEN
10 ZHEN NEW WORLD I, LLC and the government agree that Paragraph 5(g)
11 prohibits the Defense Team from allowing defendant WEI HUANG to "see
12 and review" Cooperator Material in any way, including via screen-
13 sharing using video-conference platforms such as Zoom, Webex, and
14 VTC. Specifically, defense counsel Richard Steingard agrees that he
15 will not allow defendant WEI HUANG to "see and review" Cooperator
16 Material until defendant WEI HUANG makes an appearance in this
17 district. Any additional attorneys included in the Defense Team, as
18 defined in Paragraph 2, shall also agree to this proscription.

19 Defendant's Agreement

20 5. Defense Counsel Harland Braun has conferred with defendant
21 CHAN regarding this stipulation and Protective Order, and defendant
22 CHAN agrees to the terms of the Protective Order.

23 6. Defense Counsel Richard Steingard has conferred with
24 defendant SHEN ZHEN NEW WORLD I, LLC regarding this stipulation and
25 Protective Order, and defendant SHEN ZHEN NEW WORLD I, LLC, through
26 its corporate representative, agrees to the terms of the Protective
27 Order.

1 7. Defense Counsel Ariel Neuman has conferred with defendants
2 LEE and 940 HILL, LLC regarding this stipulation and Protective
3 Order, and defendant LEE and defendant 940 HILL, LLC, through its
4 corporate representative, agree to the terms of the Protective
5 Order.

6 IT IS SO STIPULATED.

7 DATED: December 16, 2020

NICOLA T. HANNA
United States Attorney

9 BRANDON D. FOX
10 Assistant United States Attorney
11 Chief, Criminal Division

12 
13 MACK E. JENKINS
14 VERONICA DRAGALIN
15 MELISSA MILLS
16 Assistant United States Attorneys

17 Attorneys for Plaintiff
18 UNITED STATES OF AMERICA

19 DATED: December 16, 2020

20 _____
21 /s/ via e-mail authorization
22 HARLAND W. BRAUN
23 Attorney for Defendant
24 RAYMOND CHAN

25 DATED: December 16, 2020

26 _____
27 /s/ via e-mail authorization
28 RICHARD M. STEINGARD
29 Attorney for Defendant
30 SHEN ZHEN NEW WORLD I, LLC

31 DATED: December 16, 2020

32 _____
33 /s/ via e-mail authorization
34 ARIEL A. NEUMAN
35 JAMES S. THREATT
36 Attorneys for Defendants
37 DAE YONG LEE and 940 HILL, LLC